

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Case No. 2:23-cv-00377-JRG-RSP

(Member Case Under -379 Action)

JURY TRIAL DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Case No. 2:23-cv-00379-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF JASON WIETHOLTER IN SUPPORT OF PLAINTIFF
HEADWATER'S OPPOSITION TO DEFENDANTS' MOTION TO STAY PENDING
INTER PARTES REVIEW AND RELATED MANUFACTURER CASES**

1. I, Jason Wietholter, declare as follows:

2. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Opposition to Defendants’ Motion To Stay Pending *Inter Partes* Review and Related Manufacturer Cases. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

3. On October 4, 2024, the parties met and conferred regarding Defendants’ Motion.

4. Kristopher Davis and myself attended on behalf of Headwater.

5. Andrew Robb attended on behalf of Defendants.

6. During the conference, Mr. Robb stated that Defendants would not agree to be bound by any determinations in any of the other suits involving Headwater and Samsung.

7. Attached as Exhibit A is a true and correct copy of Decision Granting Institution of *Inter Partes* Review in IPR2024-00809, Paper 11, dated October 23, 2024.

8. Attached as Exhibit B is a true and correct copy of Petition for *Inter Partes* Review of U.S. Patent No. 9,198,042 in IPR2024-00809, Paper 4, dated April 19, 2024.

9. Attached as Exhibit C is a true and correct copy of Petition for *Inter Partes* Review in IPR2024-00945, Paper 1, dated June 7, 2024.

10. Attached as Exhibit D is a true and correct copy of Petition for *Inter Partes* Review in IPR2024-00944, Paper 1, dated June 7, 2024.

11. Attached as Exhibit E is a true and correct copy of Petition for *Inter Partes* Review in IPR2024-00943, Paper 1, dated June 7, 2024.

12. Attached as Exhibit F is a true and correct copy of Petition for *Inter Partes* Review in IPR2024-00942, Paper 1, dated June 7, 2024.

13. Attached as Exhibit G is a true and correct copy of Petition for *Inter Partes* Review

of U.S. Patent No. 8,924,543 in IPR2024-01042, Paper 5, dated June 20, 2024.

14. Attached as Exhibit H is a true and correct copy of Petition for *Inter Partes* Review of U.S. Patent No. 8,924,543 in IPR2024-01041, Paper 5, dated June 20, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 24, 2024 at Los Angeles, California.

By: /s/ Jason Wietholter
Jason Wietholter